

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION**

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MARC VEASEY, JANE HAMILTON, )  
 SERGIO DELEON, FLOYD J. CARRIER, )  
 ANNA BURNS, MICHAEL MONTEZ, )  
 PENNY POPE, OSCAR ORTIZ, KOBY )  
 OZIAS, JOHN MELLOR-CRUMLEY, PEGGY )  
 HERMAN, EVELYN BRICKNER, GORDON )  
 BENJAMIN, KEN GANDY, LEAGUE OF )  
 UNITED LATIN AMERICAN CITIZENS )  
 (LULAC), AND DALLAS COUNTY, TEXAS, )

*Plaintiffs,*

v.

RICK PERRY, Governor of Texas; and JOHN )  
 STEEN, Texas Secretary of State, )

*Defendants.*

CIVIL ACTION NO. )  
 2:13-CV-193 (NGR) )  
 [Lead case]

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UNITED STATES OF AMERICA, )

*Plaintiffs,*

TEXAS LEAGUE OF YOUNG VOTERS )  
 EDUCATION FUND AND IMANI CLARK, )

*Plaintiff-Intervenors,*

TEXAS ASSOCIATION OF HISPANIC )  
 COUNTY JUDGES AND COUNTY )  
 COMMISSIONERS, AND HIDALGO )  
 COUNTY )

*Plaintiff-Intervenors,*

v.

STATE OF TEXAS, JOHN STEEN, in his )  
 official capacity as Texas Secretary of State; )  
 and STEVE McCRAW, in his official capacity )  
 as Director of the Texas Department of Public )  
 Safety, )

*Defendants.*

CIVIL ACTION NO. )  
 2:13-CV-263 (NGR) )  
 [Consolidated case]

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TEXAS STATE CONFERENCE OF NAACP )

BRANCHES; and the MEXICAN	)	
AMERICAN LEGISLATIVE CAUCUS OF	)	
THE TEXAS HOUSE OF	)	
REPRESENTATIVES,	)	
<i>Plaintiffs,</i>	)	
v.	)	CIVIL ACTION NO.
	)	2:13-CV-291 (NGR)
JOHN STEEN, in his official capacity as	)	[Consolidated case]
Secretary of State of Texas; and STEVE	)	
McCRAW, in his official capacity as Director	)	
of the Texas Department of Public Safety,	)	
<i>Defendants.</i>	)	
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BELINDA ORTIZ, LENARD TAYLOR,	)	
EULALIO MENDEZ JR., LIONEL	)	
ESTRADA; ESTELA GARCIA ESPINOSA,	)	
LYDIA LARA, MARGARITO MARTINEZ	)	
LARA, MAXIMINA MARTINEZ LARA, AND	)	
<i>LA UNION DEL PUEBLO ENTERO, INC.</i>	)	
<i>Plaintiffs,</i>	)	
v.	)	CIVIL ACTION NO.
	)	2:13-CV-348 (NGR)
STATE OF TEXAS; JOHN STEEN, in his	)	[Consolidated case]
Official capacity as Texas Secretary of State;	)	
And STEVE McCRAW, in his official capacity	)	
As Director of the Texas Department of	)	
Public Safety,	)	
<i>Defendants.</i>	)	
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**DEFENDANTS' NOTICE OF DEPOSITION OF PLAINTIFF  
LENARD TAYLOR**

To: **Lenard Taylor**, by and through his attorneys of record, Jose Garza, Law Office of Jose Garza, 7414 Robin Rest Drive, San Antonio, TX 78209; Peter McGraw, Texas Rio Grande Legal Aide Inc., 3825 Agnes Street, Corpus Christi, TX 78405; and Marinda Van Dalen and Robert W. Doggett, Texas Rio Grande Legal Aid Inc., 531 E St Francis, Brownsville, TX 78520.

Pursuant to the Federal Rules of Civil Procedure, the State of Texas, Rick Perry, the Texas Secretary of State<sup>1</sup> and Steve McCraw (“Defendants”), by and through the Attorney General for the State of Texas, give notice that they will take the deposition by oral examination of Lenard Taylor, on July 18, 2014, at 10:00 A.M., at 606 Coyote Trail, Alice, Texas 78332.

This deposition will be recorded by stenographic means, conducted before an individual authorized to administer oaths, and used for any purpose permitted under the Federal Rules of Civil Procedure or court order. The deposition may be videotaped. The deposition will continue from time to time and place to place until concluded.

Dated: June 27, 2014

Respectfully submitted,

GREG ABBOTT  
Attorney General of Texas

DANIEL T. HODGE  
First Assistant Attorney General

JONATHAN F. MITCHELL  
Solicitor General

J. REED CLAY, JR.  
Special Assistant and Senior Counsel  
to the Attorney General  
Southern District of Texas No. 1160600

/s/ John B. Scott  
JOHN B. SCOTT

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<sup>1</sup> Various complaints identify the Texas Secretary of State as John Steen. The current Secretary of State, however, is Nandita Berry.

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COUNSEL FOR THE STATE OF TEXAS,  
RICK PERRY, JOHN STEEN, and STEVE  
MCCRAW

**CERTIFICATE OF SERVICE**

I hereby certify that on June 27, 2014, a true and correct copy of the foregoing document is being served via electronic mail to all counsel of record.

/s/ John B. Scott  
JOHN B. SCOTT